

IN THE U.S. BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: David Mondragon, Jr. : Chapter 13
Debtor : Bankruptcy No.: 18-12945-pmm

Hearing to be Held:

Date: July 2, 2020

Time: 10:00 am

**Place: United States Bankruptcy Court
Courtroom 4th Floor
The Gateway Building
201 Penn Street, Suite 103
Reading, Pennsylvania, 19601**

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

David Mondragon, Jr., Debtor, by and through counsel of the Ross, Quinn & Ploppert, P.C., has filed a Motion to Approve a Mortgage Loan Modification by and between Debtor and M&T Bank.

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before June 30, 2020 you or your attorney must do ALL of the following:

(a). file an answer explaining your position at

United States Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to attorney for movants:

Joseph Quinn, Esquire
ROSS, QUINN & PLOPPERT, P.C.
192 S. Hanover Street, Suite 101

Pottstown, PA 19464

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer, United States Bankruptcy Judge on July 2, 2020 at 10:00 am in:

**United States Bankruptcy Court
Courtroom 4th Floor
The Gateway Building
201 Penn Street, Suite 103
Reading, Pennsylvania, 19601**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office(s) in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

ROSS, QUINN & PLOPPERT, P.C.

By: /s/ Joseph Quinn
Joseph Quinn, Esquire
Attorney I.D. No. 307467
192 S. Hanover Street, Suite 101
Pottstown, PA 19464
T: 610.323.5300
F: 610.323.6081
JQuinn@rqplaw.com
Counsel for Debtor

Date: June 10, 2020